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June 13, 2022

The Honorable Christine P. O'Hearn, Judge  
United States District Court for the  
District of New Jersey  
Mitchell H. Cohen Building and U.S. Courthouse  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

**VIA ECF FILING**

**Re: Marshelle Hightower v. Ingerman Management Corp. et. al.  
USDC, DNJ, Docket No. 17-cv-8025-CPO-MJS**

Dear Judge O'Hearn,

For the reasons set forth in our prior submission dated May 27, 2022 (ECF 324), we respectfully submit that the Motion for Sanctions as respects the Kim Johnson Subpoena be denied.

If Your honor is not inclined to deny that Motion, then we respectfully request that we be afforded an opportunity to respond to plaintiff's recent submissions (ECF nos. 339 and 341), and also that we be afforded a hearing on said sanctions motion.

Thank you for Your Honor's consideration.

Respectfully,

*Gary Lightman*  
Gary P. Lightman

GPL:no

cc: Laura Mattiacci/Caren Gurmankin, Esquires  
(via email)  
clients